

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

)
THOMAS S. McCLOSKEY and KEVIN P.)
McCLOSKEY, Co-Administrators of)
the Estate of Philip McCloskey)
)
Plaintiffs,)
)
v.) Civil Action No. 04-11015 (RCL)
)
Robert S. Mueller, et al.)
)
)
Defendants.)
)

DEFENDANT WILLIAM H. ANDERSON'S UNOPPOSED PRO SE MOTION
FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT

Defendant William H. Anderson, in his individual capacity and acting pro se, hereby moves for an extension of time up to and including September 24, 2004 within which to file an answer or otherwise respond to Plaintiff's Complaint.

Plaintiffs' Complaint names Defendant Anderson both in his official and individual capacities for actions that occurred entirely within the scope of his employment with the Federal Bureau of Investigation. Defendant Anderson has requested Department of Justice representation for all claims. The Department of Justice's review of his request for representation in his individual capacity is still pending.

Consequently, Defendant Anderson has neither retained nor conferred with legal counsel regarding the possible responses to Plaintiffs' Complaint. Once Defendant Anderson has secured legal representation (either a Department of Justice attorney or

private counsel), an adequate amount of time will be required for said counsel to become familiar with the issues relevant to this case and to prepare an appropriate response to Plaintiffs' Complaint.

Counsel for the other federal Defendants, Assistant United States Attorney Carol Shea, has contacted plaintiffs' counsel, Kevin J. Reddington, to determine his position on this motion. Defendant Anderson has been authorized by Mr. Reddington to state that plaintiffs do not oppose it.

Therefore, consistent with the extension requested by the other federal Defendants in this case and in the interest of efficiency, Defendant Anderson requests an enlargement of sixty days up to and including September 24, 2003 in which to respond to Plaintiffs' Complaint.

Dated at Boston, in the District of Massachusetts, this ____ day of July 2004.

Respectfully submitted,



William H. Anderson, Pro Se
57 Adams Street
Revere, MA 02151

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that service of the foregoing Defendant William H. Anderson's Pro Se Motion for Extension of Time to Respond to Complaint has been made by mailing copies thereof to:

Kevin J. Reddington, Esq.
1342 Belmont Street, Suite 203
Brockton, MA 02301

Carol L. Shea, Special Attorney
Chief, Civil Division
United States Attorney's Office
P.O. Box 570
Burlington, VT 05402-0570

Gary Lee Sampson
U.S.P./Reg. No. 23976-038
P.O. Box 33
Terre Haute, IN 47808-0033

on this ____th day of July 2004.

William H. Anderson
William H. Anderson, Pro Se